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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re</b>	:	<b>Chapter 11 Case No.</b>
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<b>GENERAL MOTORS CORP., et al.,</b>	:	<b>09-50026 (REG)</b>
	:	
<b>Debtors.</b>	:	<b>(Jointly Administered)</b>
	:	
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**LIMITED OBJECTION OF LA PRODUCTIONS, LLC TO NOTICE OF (I) DEBTORS'  
INTENT TO ASSUME AND ASSIGN CERTAIN EXECUTORY CONTRACTS,  
UNEXPIRED LEASES OF PERSONAL PROPERTY, AND UNEXPIRED  
LEASES OF NONRESIDENTIAL REAL PROPERTY AND  
(II) CURE AMOUNTS RELATED THERETO**

LA Productions, LLC ("LA Productions"), by through its undersigned counsel, hereby submits this limited objection (the "Objection") to the Notice of (I) Debtors' Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property, and Unexpired Leases of Nonresidential Real Property and (II) Cure Costs Related Thereto (the "Assignment Notice"), served upon LA Productions by the above-captioned debtors and debtors-in-possession (collectively, the "Debtors") pursuant to this Court's Bidding Procedures Order [Docket No. 274].

### **Background**

1. On June 1, 2009 (the “Commencement Date”), the Debtors commenced these voluntary cases under chapter 11 of the Bankruptcy Code.

2. On June 2, 2009, this Court entered an order (the “Bidding Procedures Order”) approving the Debtors’ bidding procedures, which includes procedures regarding Debtors’ assumption and assignment of executory contracts.

3. Pursuant to the Bidding Procedures Order, on or about June 11, 2009, the Debtors delivered a notice (the “Assignment Notice”) to LA Productions, indicating that the Debtors intend to assume and assign certain of the Debtors’ agreements with LA Productions (the “Assumed Contracts”).

4. The Assignment Notice directs the Debtors’ vendors to log on to a website, or call certain telephone help lines, for the purpose of viewing the proposed Cure Amount for the Assumed Contracts.

5. However, the Debtors’ proposed Cure Amount for the Assumed Contracts with LA Productions were not available to be ascertained through either the designated website or the telephone help lines.

6. Therefore, it is presently unknown what the Debtors’ proposed Cure Amounts are for the Assumed Contracts with LA Productions.

### **LIMITED OBJECTION**

7. LA Productions does not object to the Debtors’ assumption and/or assignment of the Assumed Contracts, but out of an abundance of caution, and to properly protect its rights, LA Production hereby objects to the Cure Amount for the Assumed Contracts to the extent such amounts differ from those calculated on the books and records of LA Productions.

WHEREFORE, LA Productions respectfully requests entry of an order establishing the Cure Amount for its Assumed Contracts to be set at the amount not less than the amount calculated pursuant to LA Productions' books and records, and for such other and further relief as may be just and required under all circumstances.

Dated: June 18, 2009

Respectfully submitted,

KUPELIAN ORMOND & MAGY, P.C.

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